

## REMARKS

This application has been carefully reviewed in light of the Office Action dated September 7, 2004 ("the Office Action"). Claims 1 to 40 are presented for examination, of which Claims 1 and 33 are independent. Reconsideration and further examination are respectfully requested.

Claim 26 was objected to because of a typographical error, which has now been corrected.

Claims 1, 3 and 34 to 36 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,727,998 ("Tomiyasu"). The remaining claims<sup>1</sup> were rejected under 35 U.S.C. § 103(a) as being unpatentable over Tomiyasu in view certain ones of the following patents: U.S. Patent No. 6,757,280 ("Wilson"); U.S. Patent No. 6,157,950 ("Krishnan"); U.S. Patent No. 6,611,863 ("Banginwar"); U.S. Patent No. 6,020,973 ("Levine"); U.S. Patent No. 6,742,039 ("Remer"). All of the rejections are respectfully traversed because they fail to establish that Tomiyasu, either alone or in combination with the other applied references, teaches every element of the claims. In particular, and as explained more fully below, Tomiyasu fails to disclose at least the features of redirecting some incoming messages to an application module and passing other messages to a target network device, based on whether the application module is configured to process a functionality requested by the message.

Independent Claim 1 recites a method for mimicking network devices using

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<sup>1</sup> The Office Action rejects Claims 34 to 36 only as they depend from Claims 1 and 3; however, Claims 34 to 36 depend from other claims as well. Clarification of the bases for rejections is requested, if any rejection is maintained.

a computing device having first and second network interface cards (“NIC”), the first NIC connecting the device to an external network and the second NIC connecting the device to a local network. First, the computing device receives an incoming message from a client network device residing on the external network, the incoming message being directed to a target network device residing on the local network. By this amendment, the word “target” replaces the word “legacy” for the purpose of broadening the claims by eliminating the requirement that the target network device is a legacy device. The computing device determines if an application module residing in the computing device is configured to process a functionality requested by the incoming message. If the application module is configured to process the requested functionality, the computing device redirects the incoming message to the application module. If the application module is not configured to process the requested functionality, the computing device passes the incoming message through the local network to the target network device.

Independent Claim 33 recites a method which includes the features of receiving an incoming message from a client network device and passing the incoming message through the local network to the target network device residing on the local network. Claim 33 further includes discovering a plurality of target network printers on the local network and creating a rule in a rules table for each of the discovered target network printers.

The invention was developed as a result of the inventors’ investigation into extending the capabilities of target network devices in a way that is transparent to client devices. Traditional network environments contain many network devices of different types and different functional capabilities. Conventionally, implementation of new

technologies and improvements is accomplished by replacing network devices, updating firmware, or placing on the network a non-transparent support device that adds functionality. These solutions bear significant costs such as the cost of replacing equipment and the time spent updating and reconfiguring network devices.

In one significant advantage over conventional methods, the present invention adds functionality while remaining transparent to client network devices. As a result, the present invention results in cost and time savings because the network administrator is not required to replace equipment or reconfigure the existing devices on the network, yet is still able to extend functionality. These advantages ensue from, among other things, the feature of redirecting an incoming message, which is directed to a target network device residing on a local network, to an application module in the case that the application module is to process a functionality requested by the message.

The applied art is not seen to disclose or suggest the features of independent Claims 1 and 33, and in particular, is not seen to disclose or suggest at least the feature of redirecting an incoming message, which is directed to a target network device residing on a local network, to an application module in the case that the application module is configured to process a functionality requested by the message. Also, the applied art is not seen to disclose or suggest at least the feature of passing an incoming message through a local network to a target network device in the case that the application module is not configured to process a functionality requested by the message.

In particular, Tomiyasu is seen to relate to the following procedure for sending a print job request via an email message. First, a sending host computer 11 produces print data. (lines 42-43, column 4 of Tomiyasu). Sending host computer 11 then

transmits a print job by electronic mail to a receiving host computer 21. (lines 66-67, column 4 and lines 1-51 column 5 of Tomiyasu). Receiving host computer 21 then determines if the electronic mail is requesting a print job. (lines 52-56, column 5 of Tomiyasu). If the electronic mail is requesting a print job, receiving host computer 21 reads attribute data in the electronic mail and sends the print job to a printer that corresponds to the attribute data. (lines 60-67, column 5 and lines 1-35, column 6 of Tomiyasu).

On the other hand, if the electronic mail does not request a print job, “the routine is ended.” (lines 59-60, column 5 of Tomiyasu; see also FIG. 5 of Tomiyasu). In this case, it is seen that receiving host computer 21 does nothing more with the electronic mail. For example, FIG. 5 of Tomiyasu discloses the operational steps performed by receiving host computer 21 upon receiving the electronic mail. FIG. 5 teaches that upon determining that the electronic mail contains no print data, receiving host computer 21 bypasses all steps and simply ends operations.

Tomiyasu is not seen to disclose or suggest at least the feature of redirecting an incoming message, which is directed to a target network device residing on a local network, to an application module in the case that the application module is configured to process a functionality requested by the message. In the first place, it is seen that sending host computer 11 does not even receive an incoming message. On the contrary, the electronic mail containing the print job is produced within sending host computer 11 itself. Therefore, sending host computer 11 cannot redirect an incoming message because sending host computer 11 does not receive an incoming message.

On the other hand, receiving host computer 21 receives an electronic mail

from sending host computer 11. However, upon determining whether or not the electronic mail is requesting a print job, receiving host computer 21 either (1) reads the attribute data and sends the print job to a corresponding printer, or (2) does nothing with the electronic mail. Thus, Tomiyasu does not disclose the redirecting feature of the present invention because Tomiyasu does not disclose redirecting the print job to an application module in the case that the application module is configured to process the print job.

In addition, it is seen that Tomiyasu cannot possibly disclose both the redirecting and the passing features of the present invention because Tomiyasu discloses that “the routine is ended” upon a determination that the electronic mail does not request a print job. Simply aborting the routine and taking no further steps is not equivalent to either the redirecting feature or the passing feature of the present invention. Therefore, the sole alternative branch of Tomiyasu’s process cannot possibly include both the redirecting and passing features of the present invention because the redirecting feature occurs in the case that the application module is configured to process the functionality and the passing feature occurs in the case that the application module is not configured to process the functionality.

Therefore, Tomiyasu fails to disclose at least the features of redirecting some incoming messages to an application module and passing other messages to a target network device, based on whether the application module is configured to process a functionality requested by the message. Similarly, the other applied art is not seen to disclose the redirecting and passing features.

Accordingly, independent Claims 1 and 33 are believed to be allowable over the applied references.

The other claims in the application are each dependent from the independent claims and are believed to be allowable over the applied references for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

An Information Disclosure Statement with fee accompanies this Amendment, to provide an English-language translation to JP 2003-509969. JP 2003-509969 corresponds to the French-language document WO 01/20870, already of record. Consideration of the translation is respectfully requested.

No other matters being raised, it is believed that the entire application is fully in condition for allowance, and such action is courteously solicited.

Applicants' undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael K. O'Neill", is written over a horizontal line.

Michael K. O'Neill  
Attorney for Applicants  
Registration No.: 32,622

FITZPATRICK, CELLA, HARPER & SCINTO  
30 Rockefeller Plaza  
New York, New York 10112-2200  
Facsimile: (212) 218-2200

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